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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

**Stanley William Paher, Teresa Monroe-  
 Hamilton, and Gary Hamilton,**

Plaintiffs

v.

**Barbara Cegavske**, in her official capacity  
 as Nevada Secretary of State, **Deanna  
 Spikula**, in her official capacity as Registrar  
 of Voters for Washoe County,

Defendants

Case Number: 3:20-CV-00243

**Plaintiffs' Motion to Expedite Briefing  
 Schedule and Hearing on Merits**

Plaintiffs Stanley William Paher, Teresa Monroe-Hamilton, and Gary Hamilton, (collectively, "Voters") pursuant to Federal Rule of Civil Procedure 57, move this Court to enter an expedited briefing schedule on Plaintiffs' *Preliminary-Injunction Motion* and merits and hearing on the Motion. In Plaintiffs' good faith efforts to expedite this case, Plaintiff has emailed all pleadings to Defendants' counsel, specifically, Wayne Thorley, Nevada Secretary of State's Office; Herbert Kaplan, Washoe County District Attorney's Office; and Greg Zunino, Nevada Attorney General's Office. So all parties will be notified of the case immedi-

1 ately after filing. Voters proposed the following schedule:

- 2 • Defendants shall respond to Plaintiffs' Motion for Preliminary Injunction on Friday, April
- 3 24, 2020 at 5:00 PM PST;
- 4 • Plaintiffs shall reply on Monday, April 27, 2020 at 5:00 PM PST;
- 5 • A hearing on the Motion to be scheduled on Wednesday, April 29, 2020; and
- 6 • This Court will rule on the Motion on May 1, 2020.

7 Accordingly and for the following reasons, Plaintiffs move that this Court order that the brief-  
 8 ing, hearing, and decision for the Preliminary-Injunction Motion be expedited so that matter  
 9 may be resolved before Voters are prejudiced and irreparably harmed.

10 Voters have filed their *Complaint*, *Preliminary-Injunction Motion*, and *Motion to Consol-*  
 11 *idate the Hearing on the Motion for Preliminary Injunction with a Hearing on the Merits of*  
 12 *the Complaint*. Defendants intend to send out mail-in ballots before May 15, 2020. Ex. E  
 13 (Elko County states "[i]f you do not receive a ballot by May 15, or you need a replacement  
 14 ballot, please contact the Clerk's Office"). So mail-in ballots will be mailed out by as early as  
 15 May 12. Voters request that this Court expeditiously decide this matter in order to prevent  
 16 constitutional violations from occurring and irreparably harming voters in a short matter of  
 17 weeks.

18 Voters will be irreparably harmed because they have no remedy at law if the Plan pro-  
 19 ceeds and the election is held in violation of Voters' constitutional rights. The Secretary of  
 20 State's and County Administrator's Plan that is not authorized by the Legislature, is in viola-  
 21 tion of controlling laws, and seems to have been done without considering fundamental con-  
 22 stitutional and rule-of-law mandates that govern their work.

23 For these reasons, Voters respectfully request this Court order:

- 24 • Defendants shall respond to Plaintiffs' Motion for Preliminary Injunction on Friday, April
- 25 24, 2020 at 5:00 PM PST;
- 26 • Plaintiffs shall reply on Monday, April 27, 2020 at 5:00 PM PST;
- 27 • A hearing on the Motion to be scheduled on Wednesday, April 29, 2020; and
- 28 • This Court will rule on the Motion on May 1, 2020.

April 21, 2020

Respectfully submitted,

James Bopp, Jr. (Ind. bar #2838-84)\*

/s/ David O'Mara

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